REMARKS

Claims 21-29 are pending in the present application. Claims 1-20 and 30-43 have been previously cancelled. Claims 21-29 have been cancelled. Claims 44-51 have been added. No new matter has been added. Accordingly, Claims 44-51 remain pending in the present application.

Claim Rejections - 35 USC§ 112

The Examiner states:

Claims 22, 24, and 26 (claims 27-29 due to their dependency on claim 26 as containing all the same "means" limitations), stand rejected under 35 U.S.C. 112, second paragraph as failing to particularly point out and distinctly claim the subject matter which appellants regard as their invention.

Applicant respectfully traverses these rejections. Applicant submits that claims 22, 24 and 26-29 have been cancelled. Accordingly, the rejections to claims 22, 24, 26-29 under 35 USC § 112 have been overcome.

Claim Rejections - 35 USC§ 102

The Examiner states:

Claims 21-24 and 26-29 stand rejected under 35 U.S.C. 102 as being anticipated by Bauer.

Applicant respectfully traverses these rejections.

Prior Art

Bauer discloses a database synchronizer that facilitates computing systems which have client-side and server-side applications that share data in similar database structures, but which do not maintain a continuous connection to a single shared data source. The database synchronizer is used to synchronize the data in a central

database for a particular client with the data on that client's intermittently-connected computer.

<div align="center">Arguments</div>

Applicant respectfully submits that Bauer does not teach or suggest "…wherein the client specific setup information comprises information…to provide at least one client specific command for the client system…a program comprising at least one client specific command…" in combination with the other elements as recited in independent claims 44 and 47. Independent claim 44 is directed to a method for synchronizing data records stored on a server system with data records stored on a client system. Independent claim 47 is directed to a method for synchronizing data records stored on a client system with data records stored on a server system.

Argument #1:

Independent claim 44 recites client specific setup information that comprises information to provide at least one **client specific command** for the client system (Emphasis added; present invention). Thus, the server system generates and transmits at least one client specific command that the client system needs for synchronization, based on the client specific setup information that is provided by the client system (present invention, paragraph 0038). A method in accordance with the present invention has the advantage of reducing the amount of software required for synchronization in the client system which results in a less expensive client device with less memory (present invention, paragraph 0022).

The Examiner states that Bauer discloses "wherein the client specific setup information comprises information to provide client specific commands" at col. 6, lines 7-

10. This passage from Bauer is not related to providing client specific commands. Col. 6, lines 7-10 states:

> As illustrated, there is a server node 10 and a plurality of client nodes 20a, ..., 20x, ..., 20z, each of which having a unique identifier a, ..., x, ..., z.

In addition, Bauer discloses that the server system transmits **refresh data** to the client system (Emphasis added; Bauer, col. 2, line 60-col. 3, line 2). Transmitting refresh data to the client as disclosed by Bauer is clearly different than providing at least one client specific command for the client as recited by the present invention.

Furthermore, in Bauer, to facilitate the synchronization, a database synchronizer **is resident on the server node and client nodes** (Emphasis added; Bauer, col. 7, lines 43-45). Thus, in Bauer, each client already contains the programming instructions needed for synchronization since a database synchronizer resides on each client. Accordingly, there would be no need for the server system in Bauer to provide at least one client specific command for the client system to synchronize the data records because the client system in Bauer already has a database synchronizer with the appropriate commands included.

Argument #2:

Independent claim 44 further recites **transmitting a program** comprising at least one client specific command (Emphasis added; present invention). Thus, after the server system has generated at least one client specific command that the client system needs for synchronization, a program comprising the at least one client specific command is transmitted to the client system (present invention, paragraph 0038).

By contrast, in Bauer, the transmitted "refresh data" is not equivalent to the transmitted program comprising client specific commands as disclosed by the present

7

invention. Bauer does not disclose the server node transmitting anything other than "refresh data" to the client. Further, one of the goals of Bauer is to limit the amount of data transmitted between the server node and the client node (Bauer, col. 1, lines 56-59). Therefore, Bauer teaches away from the server node transmitting a program comprising at least one client specific command to the client node. As previously mentioned, each client, in Bauer, already contains the programming instructions needed for synchronization since a database synchronizer resides on each client. Accordingly, there would be no need for the server system in Bauer to transmit a program comprising at least one client specific command for the client system to synchronize the data records because the client system in Bauer already has a database synchronizer with the appropriate commands included.

For the above-mentioned reasons, Bauer is clearly different than the invention recited in independent claim 44. Accordingly, Applicant respectfully submits that Bauer does not teach or suggest the recited invention of independent claim 44. Therefore, independent claim 44 is allowable over the Examiner's cited rejection.

Independent claim s 47 and 49 are substantially similar in scope to independent claim 44. Therefore, Applicant respectfully submits that these claims are allowable for substantially the same reasons as described for claim 44. Claims 45-46 are dependent on allowable independent claim 44, claim 48 is dependent on allowable independent claim 47 and claims 50-51 are dependent on allowable independent claim 49. Therefore, Applicant respectfully submits that these dependent claims are allowable because they depend therefrom and also are allowable on their own merits.

<u>Claim Rejections - 35 USC§ 103</u>

The Examiner states:

Claim 25 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Bauer in view of Alam.

Claim 25 has been cancelled. Claims 46 and 51 have been added. Claims 46 and 51 are dependent on allowable independent claims 44 and 49. Therefore, Applicant respectfully submits that this dependent claim is allowable because it depends therefrom and also is allowable on its own merits.

CONCLUSION

Accordingly, based at least on the reasons above, Applicant respectfully requests reconsideration and submits that claims 44-51 stand ready for allowance, and the claims that depend therefrom, are not anticipated or suggested by the cited references.

It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as the intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment. If the Examiner has any questions or comments, the Examiner is respectfully requested to contact the undersigned at the number listed below.

Respectfully submitted,
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